

IN THE CIRCUIT COURT FOR HAMILTON COUNTY, TENNESSEE

ESTATE OF BRANDY ELLIS, b/n/k)
PAULA RITCHIE, mother of Brandy Ellis,)
Plaintiff,)
V.)
CORECIVIC OF TENNESSEE, LLC d/b/a)
SILVERDALE DETENTION CENTER,)
CORRECTCARE SOLUTIONS, INC. d/b/a)
WELLPATH, LLC,)
PRISON GUARD NO. 1 ("MS. EVANS"),)
PRISON GUARD NO. 2 (MS. GARDNER),)
Defendants.)

DOCKET NO. 1907337

JURY DEMANDED

FILED IN OFFICE
DEC - 2 PM 3:51
KIM L. HARRIS, CLERK
24

COMPLAINT

COMES the Plaintiff, by and through undersigned counsel, and would state the following:

I.

All parties, events, and causes of action cited herein are sufficiently connected to Hamilton County so as to vest jurisdiction and venue in the Hamilton County Circuit Court.

II.

On November 30, 2018, Brandy Ellis was an inmate in the custody of Defendant Silverdale Detention Center. When she was in its custody, she consistently exhibited symptoms of dangerous and self-destructive behavior of which all Defendants were acutely aware.

III.

Yet, though her impaired condition was plain for all to see, the Institutional Defendants and Defendant Prison Guards failed to place Ms. Ellis under suicide watch.

EXHIBIT A

IV.

On November 30, 2018, Brandy Ellis hanged herself in her own cell.

V.

Defendants were heedless and deliberately indifferent toward Ms. Ellis' rights under the Fourth, Eighth, and Fourteenth Amendments. They knowingly subjected her to an increased risk of severe harm. All Defendants failed to classify her properly, such that she was placed in the general prison population instead of on suicide watch; such failure thereby causing her death.

DAMAGES

VI.

The Decedent's Estate prays for \$850,000.00 in damages, to be awarded jointly and severally against all Defendants. The Estate brings this claim under 42 U.S.C. 1983, as well as the Tennessee Wrongful Death Act, T.C.A. § 20-5-106.

VII.

The Estate further prays for the costs of the Clerk, discretionary costs, attorney fees under 42 U.S.C. 1988, and all other relief to which the proof in this case may show it to be entitled.

VIII.

Plaintiff demands a jury to try the issues of this cause of action.

(Signature on following page)

Respectfully submitted,

LAW OFFICES OF JOHN M. WOLFE, JR.



JOHN M. WOLFE, JR. | BPR No. 010319

Counsel for Plaintiff

707 Georgia Avenue, Suite 302

Chattanooga, TN 37402

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423.265.8055 | Fax

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ESTATE OF BRANDY ELLIS, b/n/k
PAULA RITCHIE, mother of Brandy Ellis,

Plaintiff,

V.

CORECIVIC OF TENNESSEE, LLC d/b/a
SILVERDALE DETENTION CENTER,
CORRECTCARE SOLUTIONS, INC. d/b/a
WELLPATH, LLC,
PRISON GUARD NO. 1 ("MS. EVANS"),
PRISON GUARD NO. 2 (MS. GARDNER),

Defendants.

DOCKET NO. AC1337

JURY DEMANDED

FILED IN OFFICE
2019 DEC -2 PM 3:51
CLERK
BY MD

COST BOND

The undersigned acknowledges and hereby binds the undersigned for the payment of all costs in this court which may at any time be adjudged against Plaintiff, (hereinafter "principal") in the event said principal shall not pay the same if so ordered by this Court.

Witness my hand this 2nd day of December, 2019.

Respectfully submitted,

LAW OFFICES OF JOHN M. WOLFE, JR.

John M. Wolfe, Jr.
JOHN M. WOLFE, JR. | BPR No. 010319
Counsel for Plaintiff
707 Georgia Avenue, Suite 302
Chattanooga, TN 37402
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State of Tennessee

In the Circuit Court of Hamilton County

ESTATE OF BRANDY ELLIS
R/N/F PAULARIECHIE, Plaintiff
MOTHER.

No. 19C1337

CORE CIVIC, GUARD #1,
GUARD #2,
Correct Case Solutions, Inc. Defendant

SUMMONS

TO: CORE CIVIC 6900 STANDEFER GAP ROAD.
Defendant Address
Correct Case Solutions, Inc. 6900 STANDEFER GAP ROAD.
Defendant Address
GUARD #1 (EVANS) 6900 STANDEFER GAP ROAD.
Defendant Address 6900 STANDEFER GAP ROAD.
GUARD #2 (GARDNER)

You are hereby summoned to answer and make defense to a bill of complaint which has been filed in the Circuit Court of Hamilton County, Tennessee in the above styled case. Your defense to this complaint must be filed in the office of the Circuit Court Clerk of Hamilton County, Tennessee on or before thirty (30) days after service of this summons upon you. If you fail to do so, judgement by default will be taken against you for the relief demanded in the complaint.

WITNESSED and Issued this _____ day of _____, 20____

Larry L. Henry, Circuit Court Clerk

CIRCUIT COURT OF HAMILTON COUNTY
500 COURTHOUSE
625 GEORGIA AVENUE
CHATTANOOGA, TENNESSEE 37402
423/209-6700

By _____
Deputy Circuit Court Clerk

Attorneys for Plaintiff JOHN M. Wolfe, JR BOPR #010319
707 GEORGIA AVENUE, STE 302, CHATTANOOGA, TN 37402
Address

Plaintiff's Address 820 E. OLD LOVELADY ROAD, HIXSON, TN 37343

Received this _____ day of _____, 20____

/S/ _____
Deputy Sheriff



ADA COORDINATOR, FOR ASSISTANCE CALL (209-7500)

**State of Tennessee,
County of Hamilton**

I, Larry L. Henry, Clerk of the Circuit Court, in and for the State and County aforesaid, hereby certify that the within and foregoing is a true and correct copy of the original writ of summons issued in this case.

Larry L. Henry, Circuit Court Clerk

By _____ D.C.

OFFICERS RETURN

I certify that I served this summons together with the complaint as follows:

- ☐ On, _____, 20_____, I delivered a copy of the summons and complaint to the defendant, _____
- ☐ Failed to serve this summons within 90 days after the issuance because: _____

Hamilton County Sheriff

Deputy Sheriff

CLERK'S RETURN

I hereby acknowledge and accept service of the within summons and receive copy of same, this _____ day of _____ 20_____.

Defendant

Larry L. Henry, Circuit Court Clerk

By _____ D.C.

Notice to Defendant(s)

Tennessee law provides a ten thousand (\$10,000) personal property exemption from execution or seizure to satisfy a judgment. If a judgment should be entered against you in this action and you wish to claim property as exempt, you must file a written list, under oath, of the items you wish to claim as exempt with the clerk of the court. The list may be filed at any time and may be changed by you thereafter as necessary; however, unless it is filed before the judgment becomes final, it will not be effective as to any execution or garnishment issued prior to the filing of the list. Certain items are automatically exempt by law and do not need to be listed; these include items of necessary wearing apparel (clothing) for yourself and your family and trunks or other receptacles necessary to contain such apparel, family portraits, the family Bible, and school books. Should any of these items be seized you would have the right to recover them. If you do not understand your exemption right or how to exercise it, you may wish to seek the counsel of a lawyer.